

PETER S. CHRISTIANSEN, ESQ.  
Nevada Bar No. 5254  
pete@christiansenlaw.com  
R. TODD TERRY, ESQ.  
Nevada Bar No. 6519  
tterry@christiansenlaw.com  
KEELY P. CHIPPOLETTI, ESQ.  
Nevada Bar No. 13931  
keely@christiansenlaw.com  
CHRISTIANSEN TRIAL LAWYERS  
710 S. 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
Telephone: (702) 240-7979  
Facsimile: (866) 412-6992

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

EDWINA BAILEY, individually,

Plaintiff,

vs.

SMITH'S FOOD & DRUG CENTERS, INC.  
d/b/a SMITH'S FOOD & DRUG #358;  
KATIE WILSON; DOES 1 through 100 and  
ROE CORPORATIONS 1 through 100,  
inclusive,

Defendants.

CASE NO. 2:20-cv-00328-JAD-VCF

**STIPULATION AND ORDER TO  
EXTEND THE TIME FOR  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTIONS IN  
LIMINE**

**(First Request)**

ECF Nos. 67, 68

Plaintiff, Edwina Bailey, by and through her attorneys, Christiansen Trial Lawyers, and Defendant, Smith's Food & Drug Centers, Inc., by and through its attorneys, Cooper Levenson, P.A. (collectively the "Parties") enter into the following stipulation and proposed order to allow Plaintiff Edwina Bailey an extension of time in which to file an opposition to Defendant's Motions in Limine [ECF No. 67]. In particular, the Parties stipulate as follows:

1. Defendant's Motions in Limine [ECF No. 67] was filed on September 16, 2022, with Plaintiff's Opposition thereto originally due on September 30, 2022.



2. Plaintiff's Counsel has had to dedicate substantial time to preparation for trial in a matter entitled *Estate of Juan Manuel Jimenez-Lopez v. CMC Steel Fabricators, Inc., et al.*, Case No. A-18-779263-C, Eighth Judicial District Court, Clark County, which is currently set to begin on October 10, 2022. Due to the trial setting in *Jimenez-Lopez*, a majority of Counsel's time has been consumed litigating that matter.

3. Accordingly, additional time is necessary for Plaintiff to file her Opposition to Defendant's Motions in Limine.

4. The Parties agree that the deadline for Plaintiff to oppose Defendant's Motions in Limine shall be extended from Friday, September 30, 2022, to Monday, October 3, 2022.

5. The Parties stipulate good cause exists for the agreed upon extension, which is made in good faith and not for purposes of delay.

DATED this 29th day of September, 2022

CHRISTIANSEN TRIAL LAWYERS  
/s/ Keely P. Chippoletti

PETER S. CHRISTIANSEN, ESQ.  
Nevada Bar No. 5254  
R. TODD TERRY, ESQ.  
Nevada Bar No. 6519  
KEELY P. CHIPPOLETTI, ESQ.  
Nevada Bar No. 13931  
710 S. 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

DATED this 29th day of September, 2022

COOPER LEVENSON, P.A.  
/s/ Gregory A. Kraemer

JERRY S. BUSBY, ESQ.  
Nevada Bar No. 1107  
GREGORY A. KRAEMER, ESQ.  
Nevada Bar No. 10911  
3016 West Charleston Blvd., Suite 195  
Las Vegas, Nevada 89102  
*Attorneys for Defendant*

### **ORDER**

IT IS HEREBY ORDERED that Plaintiff's opposition to Defendant's Motions in Limine [ECF 67] currently due on September 30, 2022, be extended to October 3, 2022.

DATED: September 30, 2022

  
JENNIFER A. DORSEY  
UNITED STATES DISTRICT JUDGE

